



16842 Von Karman Avenue, Suite 200  
Irvine, CA 92606  
949-417-4590  
Fax: 949-417-4591  
www.ipmobilenetinc.com

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Comments Re: WT Docket No. 04-344; RM-10821; FCC 04-207 (Proposed Rule on Maritime Communications, as Published in the Federal Register on November 15, 2004)**

IP MobileNet is a state-of-the-art developer of wireless data networks for Commercial and Public Safety applications with extensive technology that excels in the demanding public safety market. The company has considerable experience in mobile data wireless systems and our clients include:

1. Los Angeles Sheriff's Department
2. State of Kentucky
3. State of Utah
4. State of Wisconsin and others.

IP Mobile Net recently responded to an RFI from MariTEL to deploy a nationwide wireless data service. This RFI considered the impact of AIS deployment as contemplated by the Commission's "Notice of Proposed Rule Making for AIS". IP Mobile Net's comments follow.

1. AIS interference characteristics are unique to any forms of interference typically encountered in the Public Safety environment.
2. Uninterrupted data communications on channels adjacent and adjoining to AIS transmissions cannot be guaranteed because of expected high power into the data receiver.
3. Uninterrupted data communication can only be guaranteed when the data receiver is more than 75 kHz away from the AIS transmitter or when AIS interference is reduced to levels generally below -70 dBm on a given channel.

The above implementation criterion is typical for Public Safety and Commercial wireless data systems which are designed for significant transmitter and receiver separation in both spectrum and power. Transmission and reception on adjacent channels is highly discouraged because of the negative impact to system performance.

IP MobileNet encourages the Commission to take every available measure to minimize the impact of AIS transmissions to users of adjacent channels in this band. Similar to Public Safety systems, the commission may consider a flexible AIS channel plan to accomplish this goal.

Should you require any additional information please contact the undersigned at [dgodfrey@ipmn.com](mailto:dgodfrey@ipmn.com) or 858-342-4664.

Sincerely,

David A. Godfrey  
IPMobileNet